

UNITED STATES)

v.)

Noel Hernandez,)

Defendant.)

Mag. No. 04-000858-003

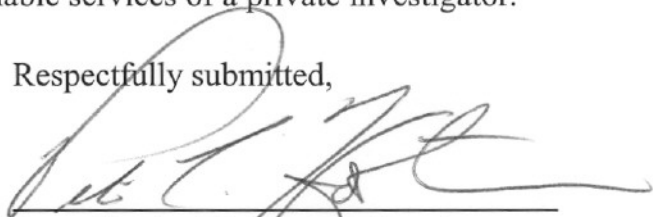
**DEFENDANT NOEL HERNANDEZ'S *EX PARTE* MOTION FOR
FUNDS FOR INVESTIGATOR**

NOW COMES the defendant, Noel Hernandez, through counsel, and hereby moves this Honorable Court for an Order approving expenses for the employment of GVB Investigations for a defense investigation of the facts surrounding this case. GVB receives \$75.00/hour for their services.

As grounds therefore, Hernandez states that he is indigent and unable to pay for an investigator's services, and that the requested funds are reasonably necessary to prevent him from being subjected to disadvantage in preparing or presenting his case adequately, in comparison to one who could afford to pay. Mr. Hernandez has already been determined to be indigent by the Court. It is respectfully submitted that funds in an initial amount of \$2000.00 are necessary to locate and interview witnesses.

WHEREFORE, this Honorable Court is respectfully urged to authorize the expenditure of funds to pay for the reasonable services of a private investigator.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read 'Peter C. Horstmann', is written over a horizontal line.

Peter Charles Horstmann, Esquire
BBO #556377

PARTRIDGE, ANKNER & HORSTMANN, LLP
200 Berkeley Street
Boston, Massachusetts 02116
(617) 859-9999

Attorney for Defendant
Noel Hernandez